

## INTRODUCTION

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The City of Hammond is committed to fair housing for all of its residents. The City's Human Relations Commission is a testament to the City's commitment to fair housing. By investing in the Human Relations Commission, the City of Hammond is one of only fifty-one local governments in the nation to achieve a substantial equivalence certification from HUD, meaning the City enforces a law that provides substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the federal Fair Housing Act. The City of Hammond is also committed to providing the greatest level of opportunity to all of its residents. In April 2015, the City passed ordinance 9293 which prohibits discrimination based upon sexual orientation and gender identity in employment, housing, services and accommodations.

The goal of this document, the Assessment of Fair Housing (AFH) for the City of Hammond, Indiana, is to identify fair housing issues within the City's jurisdiction, identify potential contributing factors to fair housing choice, and recommend actions that the City and its partners can take to eliminate or remedy the identified issues and contributing factors.

At the heart of the AFH is an analysis and evaluation of housing patterns for the City and the region. This includes an assessment of demographic patterns, the degrees of segregation and integration of members of each protected class, the overlap between concentrations of poverty in predominantly minority neighborhoods, and disparities in opportunities based on limited housing choice. The AFH also evaluates the current capacity of government and fair housing advocates to uphold fair housing rights through outreach and enforcement efforts.

This analysis and evaluation will serve as the basis for fair housing planning within the City of Hammond and provides essential information to policy makers, administrative staff, housing providers, lenders, and advocates to affirmatively further fair housing choice.

## HOW WAS THIS DOCUMENT DEVELOPED?

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As a recipient of federal affordable housing and community development grants, the City is required to follow the fair housing planning regulations mandated by the U.S. Department of Housing and Urban Development (HUD). More information on HUD's guidelines can be found at: <https://www.hudexchange.info/programs/affh/>.

Under these guidelines, the City must use the HUD-provided format and data, which includes data for the jurisdiction and region, to complete the AFH. However, certain HUD-provided data may have limitations. For this reason, program participants must supplement the HUD-provided data with local data and local knowledge.

Local data refers to metrics, statistics, and other quantified information, subject to a determination of statistical validity by HUD, that are relevant to program participants' geographic areas of analyses, can be found through a reasonable amount of searching, are readily available at little or no cost, and are necessary for the completion of the AFH using the Assessment Tool.

Local knowledge means information to be provided by program participants that relates to program participants' geographic areas of analyses and that is relevant to program participants' AFH, is known or becomes known to program participants, and is necessary for the completion of the AFH using the Assessment Tool.

The City must consider information relevant to the jurisdiction or region submitted during the community participation process, including recommendations of other data sources to assess, but need not expend extensive resources in doing so. It is the discretion of the City to choose the supplemental information that is most relevant to its analysis. HUD does not expect program participants to hire statisticians or other consultants to locate and analyze all possible sources of local data. Program participants are not generally expected to conduct primary data gathering or analysis, or a quantitative impact evaluation requiring empirical research to objectively determine causation.

## HOW CAN I PARTICIPATE IN THE PLANNING PROCESS?

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A draft of the full document will be made available for public review and comment beginning September 1st, 2016. The City will consider all written comments received before October 1st, 2016. The complete document will be available on the City's website at [www.gohammond.com](http://www.gohammond.com) and at the Department of Planning and Development at City Hall, 5925 Calumet Avenue.

The City will hold a public hearing at 1:00 PM on September 1st at the Hammond Public Library located at 564 State St. The City will consider all comments received at the public hearing. The City may hold additional meetings to gather input throughout September. Please check [www.gohammond.com](http://www.gohammond.com) for the most up to date schedule.

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**Public Comment Period**

The City will hold a public comment period commencing September 1<sup>st</sup> and ending September 30<sup>th</sup>. All comments received by the City will be summarized in an attachment to the draft plan. Written comments received during the formal comment period and those received orally at public hearings will receive a written response and will be included in the documents submitted to HUD. The City will accept comments throughout the year outside of the public comment periods, but the City cannot guarantee that these comments will be included in the submitted versions to HUD.

Comments may be emailed to [millero@gohammond.com](mailto:millero@gohammond.com) or submitted in writing to:

City of Hammond Community Development  
ATTN: Ms. Owana Miller  
5925 Calumet Avenue  
Hammond IN 46320

**Habla Español?**

Para la versión en Español, llamar el (219) 853-6501 o visitor  
[www.gohammond.com](http://www.gohammond.com)

**WHAT IS FAIR HOUSING?**

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Fair Housing is the law of the land. There are laws at the federal, state, and local levels to ensure fair housing is a right of every citizen. At the federal level, the Civil Rights Act of 1968 protects the right to fair housing for all people and prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status and disability. The State of Indiana and the City of Hammond have passed laws that mirror federal law and have achieved “substantial equivalence” which entitles the State and City access to resources for addressing fair housing complaints.

Despite these laws, discrimination in the housing market still exists. In recent years, the U.S. Department of Housing and Urban Development (HUD) has reported a record number of housing discrimination complaints for the nation. There are both positive and negative aspects to the increase in complaints. A higher level of complaints indicates more people are aware of the right to fair housing choice and are willing to take action to protect that right. Conversely, the record number of complaints serves as a reminder that housing discrimination remains prevalent.

## WHAT IS AFFIRMATIVELY FURTHERING FAIR HOUSING?

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As a recipient of federal affordable housing and community development funds, the City of Hammond has a duty to affirmatively further fair housing. Affirmatively furthering fair housing is two-fold. In addition to combating discrimination, the City must take meaningful actions that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.

Specifically, the City's fair housing actions should include:

- Actions to address significant disparities in housing needs and in access to opportunity,
- Actions to replace segregated living patterns with truly integrated and balanced living patterns,
- Actions to transform racially and ethnically concentrated areas of poverty into areas of opportunity, and
- Actions to foster and maintain compliance with civil rights and fair housing laws.

## WHAT FAIR HOUSING ISSUES EXIST TODAY?

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HUD has published guidance on fair housing planning that includes a list of forty one contributing factors that may play a role in fair housing issues. In the course of developing its plan, the City has identified the following contributing factors.

### **Private Discrimination**

In reviewing data for the City's down-payment assistance program, Homebound, there was a lack of African American homebuyers purchasing homes in the northern portion of the City, including the North Hammond and Robertsdale neighborhoods. While the City has not been able to determine specific instances of discrimination, African Americans born and raised in the City did not find this statistic surprising. Further investigation is needed.

### **Access to Financial Services / Lending Discrimination**

Based on an assessment of HMDA data, African Americans and Hispanics are less likely to originate home purchase loans. The data cannot determine if the cause of this disparate outcome is discrimination. Other possible contributing factors would include a lack of access to financial services, credit counseling, and economic opportunities.

### **Deteriorated and Abandoned Properties / Land use and zoning laws**

Hammond has an older housing stock that is not being replaced in large number through rehabilitation or redevelopment. A large number of housing units fall into disrepair and in some cases are abandoned. The most appropriate solution to remove the negative effects of these blighted properties is to demolish them. Many of these older homes were built on small lots, in some cases only 25 feet wide. The zoning requirements call for a minimum lot width of 40 feet to redevelop. In order to build a new unit, a builder would need to combine two lots together or seek a variance.

The impediments to redeveloping these blighted properties have a disparate impact on their surrounding areas, which are increasingly populated with Hispanic and African American residents. The latest Census shows that Hammond's two largest minority populations, Hispanics and African Americans, now account for 56% of the City population. Since 1990, the City has gained 17,643 Hispanic residents and 9,442 African American residents while the White Non-Hispanic population decreased by 33,534. Put into a regional context, these demographic trends lead to an increasingly segregated living pattern.

### **Lack of Private Investment in Specific Neighborhoods**

New housing development in Lake County continues to be concentrated in the communities on the outskirts of the metropolitan region. Over the last six years, new housing development and investment within Lake County is primarily located in its southern communities. Crown Point, St. John, Merrillville, Cedar Lake, and Winfield account for 75% of the new housing units authorized by permits reported from 2010-2015. Communities in the northern portion of Lake County, including Hammond, East Chicago, Whiting, and Gary, accounted for only 5% of the permit activity.

This lack of private investment within the City creates regional disparities in access to opportunity and results in deteriorating quality of housing stock, poor school performance, and fewer employment opportunities. From a regional context, these disparities have a disparate impact on the populations of Hammond, East Chicago, and Gary which have relatively larger minority populations. These are large, complex issues that will require coordinated and comprehensive strategies at the regional level to address.

### **Siting selection policies / decisions for publicly supported housing**

A RECAP is a neighborhood with a high poverty rate and a non-white population of 50 percent or more. The City of Hammond has one area identified as a Racially/Ethnicity Concentrated Area of Poverty (RECAP). This area's qualification as a RECAP is largely a result of the clustering of affordable housing developments into one area. Most of the housing units within the RECAP identified within Hammond are subsidized.

According to the South Suburban Housing Center, of the eleven affordable housing developments in Hammond, including public housing, low-income housing tax credit or privately assisted housing, nine of the eleven are located in two clusters. Four developments are located within the RECAP and five additional developments are located in Columbia Center. These multi-family developments contain 973 units (83.6%) of Hammond's total subsidized developments. The RECAP is a majority low-income African American area. The Columbia Center area has a population that is 64.5% low to moderate income African American and Hispanic.

The site selection for large affordable housing developments can become a fair housing issue if members of a protected class, such as racial minorities, are disproportionately represented among low-income populations who would benefit from low-cost housing ***and*** the housing developments are segregated or located in areas that offer a relative lack of opportunity. In the case of Columbia Center, the Hammond Housing Authority has attracted huge amounts of investment to increase the overall standard of housing and serves as an asset to the surrounding neighborhood. The City will continue to explore potential issues and solutions within the RECAP.

**Availability, type, frequency, and reliability of public transportation**

The City administered a public bus service until 2010, when the administration of the bus service was transferred to the Regional Bus Authority due to fiscal pressures. The Regional Bus Authority was never able to secure an adequate funding source and ended operations in June 2012. Portions of the City currently receive limited service from PACE Bus Lines and the Gary Public Transportation Corporation (GPTC).

The lack of public transportation is one of the most frequently cited issues facing low income persons in the City of Hammond. A lack of public transportation can become a fair housing issue when members of a protected class, such as persons with disabilities and racial minorities, are disproportionately represented among transit users and are limited in their housing choice.

Northwest Indiana Regional Planning Commission (NIRPC) is the planning agency that coordinates public transit for the region, including fixed route, complementary paratransit, and demand response services. In 2006, a local advocacy group for persons with disabilities obtained a federal court consent decree ordering NIRPC and several local public transit agencies to comply with the Americans with Disabilities Act. While the federal litigation was ended in June 2014 through a conciliation agreement, the adequacy of transportation for persons with disabilities remains an issue in the City and Lake County as a whole.

## WHAT ARE THE PROPOSED ACTIONS TO ADDRESS THE ISSUES?

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For each fair housing issue and contributing factor described above, the City proposes the following goals and strategies to address the issue and its contributing factors. When finalized, each proposed goal will identify parties who will be responsible for carrying out the strategies and actions to meet the goal as well as metrics, milestones, and timeframes to gauge performance.

**It is important to note that the following actions are proposed and are subject to change based on approval of City elected officials and feedback received during the public comment period.**

Overall, the City's Department of Planning and Development will oversee and report on the progress of the following proposed actions. Progress and performance will be included in the annual Consolidated Annual Performance and Evaluation Report (CAPER) submitted to HUD each June.

### **Combat Private Discrimination**

There is a need to better coordinate the efforts of all fair housing agencies within the region to ensure that the limited resources available to each are used to their maximum efficiency. The City will continue to support the Hammond Human Relations Commission to investigate instances of private discrimination. When necessary, the Human Relations Commission will coordinate with other fair housing agencies, including South Suburban Housing Center and Northwest Indiana Reinvestment Alliance, to conduct investigations and enforcement efforts.

The specific issue cited above, namely the lack of African American Homebound participants purchasing homes in North Hammond and Robertsdale, will be further assessed in the first year of this plan and develop specific recommendations to ensure any identified issues are addressed.

In addition, the South Suburban Housing Center has the capacity to conduct a substantial testing monitoring project to analyze systemic rental, sales, mortgage lending, disability accessibility and REO property testing with funds made available from HUD for this purpose, or to jointly apply with SSHC to obtain funding for the project.

#### Potential Actions:

- Ten (10) Fair Housing Complaint investigations each year
- Recommendation on Impediments to African American buyers in North Hammond and Robertsdale
- Systemic testing of mortgage lending and/or steering



Responsible Party: Hammond Human Relations Commission and partnering outside agencies

**Provide Greater Access to Financial Services / Examine Lending Discrimination**

The City currently requires homebuyer counseling for all of its federally-funded homebuyer programs, including the Homebound down payment assistance program and the development of homebuyer housing through partner agencies like United Neighborhoods, Inc. In addition, agencies such as the Northwest Indiana Reinvestment Alliance, a HUD-approved housing counseling agency, and local lenders sponsor homebuyer counseling workshops and clinics. These workshops are well attended and have helped a number of homebuyers from protected classes. However, the final metric of loan origination for minority buyers remains disproportionately low. An underlying issue may be poor credit for potential buyers.

Potential Actions:

- Systemic testing of mortgage lending
- Creation of credit repair program / Individual Development Accounts (IDA) - *proposed*

Responsible Party: Hammond Department of Planning and Development and partnering outside agencies

**Encourage Redevelopment and Private Investment**

The City needs to strategically link the redevelopment of new housing units to parcels that are now vacant due to demolition of vacant structures.

Potential actions:

- Examine potential changes to minimum lot widths outlined in the zoning ordinance
- Funding subsidies for the development of new in-fill housing.

Responsible Parties: City Department of Planning and Development; City of Hammond Zoning Division; Hammond City Council

**Siting selection policies / decisions for publicly supported housing**

In the course of the planning process, South Suburban Housing Center recommended the following actions in regard to site selection policies of publicly supported housing.

Potential Actions:

- All new or redeveloped multi-family affordable housing be scattered in small developments throughout the city in opportunity areas outside of the RECAP and Columbia Center locations.
- As units in older developments in the RECAP are removed from the housing stock, they are replaced with an equal number of affordable units outside of this area.

Responsible Parties: City Department of Planning and Development; Hammond Human Relations Commission; Hammond Housing Authority; City of Hammond Zoning Division

**Increase the reliability of public transportation**

The City Department of Planning and Development needs to work with existing transit providers, including NIRPC, PACE, GPTC, and North Township, to improve access to reliable to transportation to person with disabilities.

Potential Actions:

- Modify existing bus routes to better serve neighborhoods with concentrations of assisted housing and the RECAP
- Explore the possibility of using federal grant dollars to supplement public transportation to increase access to employment centers, especially for neighborhoods with concentrations of assisted housing and the RECAP.

Responsible Party: City Department of Planning and Development.

**Promote Mobility**

In the course of the planning process, South Suburban Housing Center recommended the following proposed actions in order to promote greater mobility.

Proposed Actions:

- Development of a voluntary mobility counseling program for Housing Choice Voucher holders to assist them in locating units and allowing movement to opportunity areas in Hammond and other communities in the region.

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- Introduction of “source of income” protections in fair housing ordinances, on a county-wide basis, to create access to a larger supply of housing units in opportunity areas for voucher holding families.

Responsible Parties: Hammond Housing Authority (mobility counseling); Hammond City Council and other local governments (fair housing ordinance)

**Address disparities in access to opportunities in RECAP**

Proposed Actions:

- The City will focus more of its self-sufficiency programs and provide incentives to community service providers to better service residents living the RECAP and other areas with relatively high concentrations of minorities and poverty. These programs include services directed at youth development, such as Parents as Teachers, Youthbuild, and Big Brothers/Big Sisters.
- Support the formation of a Community Based Development Organization that can lead a coordinated response to the priority needs of RECAP residents.

Responsible Party: City Department of Planning and Development; Hammond Housing Authority.